

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

ATTORNEY/CLIENT PRIVILEGE

MEMORANDUM

Shpack
11.09
SDMS# 249709

DATE : February 21, 2006

FROM: William F. Hanscom, Investigator
Search & Cost Recovery Section
Office of Site Remediation & Restoration

TO : Barbara O'Toole, Enforcement Coordinator
Search & Cost Recovery Section
Office of Site Remediation & Restoration

SUBJ : Shpack Remediation Site



SDMS DocID 249709

While working on another assigned site I found the following relative to Swank, Inc.

1983

American Biltrite, Inc. acquired 50 % ownership of K & M Associates, a jewelry supplier.¹

1995

American Biltrite, Inc., acquired a controlling interest in K & M Associates, a national supplier, distributor and servicer of a wide variety of adult, children's and specialty items of fashion jewelry and related accessories.²

¹ Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.

² Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.

(Page 2 of 2)

July 24, 2001

K & M Associates, a subsidiary of American Biltrite, Inc., acquired certain assets associated with the women's costume jewelry division of Swank, Inc.³

³ Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.